

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

[illegible]

**STIPULATION AND PROPOSED ORDER REGARDING REMOTE  
ACCESS FOR NON-TESTIFYING EXPERTS**

WHEREAS, this action was commenced on June 27, 2005 by plaintiffs Advanced Micro Devices, Inc. and AMD International Sales & Service, Ltd. (hereafter jointly, “AMD”) against defendants Intel Corporation and Intel Kabushiki Kaisha (hereafter jointly, “Intel”);

WHEREAS, coordinated class actions filed by purchasers ("Class Plaintiffs") are also pending in this District against Intel pursuant to a November 3, 2005 order of the Judicial Panel on Multidistrict Litigation;

WHEREAS, AMD, Intel, and the Class Plaintiffs have jointly entered into the SECOND AMENDED STIPULATION REGARDING ELECTRONIC DISCOVERY AND FORMAT OF DOCUMENT (hereafter, "Stipulation"), approved by the Court;

WHEREAS, Paragraphs 16-17 of the Stipulation generally governs access to the native documents;

WHEREAS, Paragraph 18 of the Stipulation governs access to the native files by non-testifying expert personnel;

WHEREAS, the parties have met and conferred with regard to providing additional access to native files by non-testifying expert personnel;

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND AMONG AMD, INTEL, AND CLASS PLAINTIFFS, THROUGH THEIR RESPECTIVE COUNSEL AND SUBJECT TO THE APPROVAL OF THE COURT, AS FOLLOWS:

1. Intel, AMD, and Class Plaintiffs shall each be permitted to designate not more than three non-testifying experts for remote access to the native document database.
2. Each such designee shall agree to comply with the security protocols defined in the Stipulation, and shall not be permitted to download, copy, print, or otherwise utilize the documents outside the confines of the native review application tool.
3. The parties agree to monitor compliance, and report any breaches of security promptly, and to suspend access to any non-testifying expert who does not comply with the protocols in any manner.
4. Staff assisting the non-testifying expert will be permitted to access the native documents, and will similarly be bound by the security provisions of the Stipulation. A maximum of 3 staff members for each non-testifying expert shall be

permitted such access. A list will be maintained by each party of the individuals accessing the database. In the event of a dispute between the parties regarding compliance with the protocols, and for good cause shown, the list may be provided *in camera* to the Special Master for his use in resolving such disputes as may arise.

Dated: March 24, 2008

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Dated: March 24, 2008

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Interim Liaison Class Counsel, MDL  
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**SO ORDERED:**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Joseph J. Farnan, Jr.  
United States District Judge  
District of Delaware

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